

**THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

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**ANNA CHIMANSKI, et., al.,**

**Case No. 17-CV-4306**

**Plaintiff**

**vs.**

**HON. AMY J. ST.EVE**

**FRONTIER AIRLINES INC**

**Defendant**

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**AMENDED NOTICE OF PLAINTIFF'S MOTION TO STRIKE AFFIRMATIVE DEFENSES PURSUANT TO RULE 12(f)(2) OF FED. R. CIV. PROCEDURE**

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TO: Honorable Amy J. St.Eve.  
Everett McKinley Dirksen Building  
Courtroom 1241 | Chambers 1260  
219 South Dearborn Street  
Chicago, Illinois 60604

TO: Emmett Michael Shaughnessy, Esq  
Adler Murphy & McQuillen LLP.  
20 S. Clark Street, Suite 2500,  
Chicago, Illinois 60603

Please take notice that on 12<sup>th</sup> day of September 2017 at 8:30 A.M. or as thereafter directed by this Honorable Court the undersigned counsel will appear before the Honorable John J. Tharp, Jr in the United States District Court for Northern District of Illinois, Room 1419, located at: 219 South Dearborn Street, Chicago, Illinois 60604 and present the following motion: **Plaintiff's Motion to Strike Affirmative Defenses pursuant to the Rule 12(f)(2) of Fed. R. Civil Procedure**. This Notice is duly served upon you pursuant to LR 5.4 and 5.5.

Dated this Notice of Motion on this 3<sup>rd</sup> day of September 2017.

Respectfully submitted by:  
GOROKHOVSKY LAW OFFICES, LLC  
Attorneys for Plaintiffs

BY: Vladimir Gorokhovsky, Esq.

/s/Vladimir Gorokhovsky, LL.M.  
ILND TR. 10994

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Mequon, WI 53092  
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**CERTIFICATE OF SERVICE OF  
PLAINTIFF'S AMENDED NOTICE OF MOTION TO STRIKE AFFIRMATIVE  
DEFENSES PURSUANT TO RULE 12(f)(2) OF FED. R. CIV. PROCEDURE**

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Under penalties as provided by law and pursuant to Local Rule 5.4 and 5.5 (b) the undersigned counsel of record for the above-named plaintiff hereby certifies that the within pleadings were served via CM/ECF upon defendant's counsel, Attorney Emmett Michael Shaughnessy of Adler Murphy & McQuillen, 20 S. Clark Street, Suite 2500, Chicago, Illinois 60603 on September 3, 2017.

Dated this Notice on this 3<sup>rd</sup> day of September 2017.

Respectfully submitted by:

GOROKHOVSKY LAW OFFICES, LLC  
Attorneys for Plaintiffs

BY: Vladimir Gorokhovsky, Esq  
/s/Vladimir Gorokhovsky, LL.M.  
ILND TR. 10994

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